

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

Ronald E. Proctor Jr.,  
Plaintiff,



Civil Action No. 05-134-JJF?

v.  
CPT C. SEGARS RETAIL,

MOTION TO REINSTATE

Come Now, Ronald E. Proctor Jr. Prase In The  
Above Styled Cause Pursuant To Rule 6(b) To Reinstate  
The Above Action That Would There Fore Show:

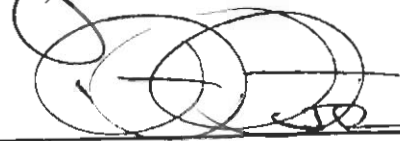
- 1.) IMMEDIATE DANGER IS PRESENT IN  
THE ABOVE ACTION (SEE EXHIBIT "A")
- 2.) THE ISSUES CONTAINED THEREIN -  
- UNDER COMPLAINT PRESENT A 1ST AMENDMENT ON-  
- GOING FIRST AMENDMENT RIGHTS VIOLATIONS AS TO SEIZURE  
OF Digital Files TO SUPPORT IMMEDIATE DANGER EX-  
- CEPTIONS AS CONTAINED IN EVIDENCE WITHHELD IN DR.  
NO. 1012627 filed by Gt. F. Kromka AND Withheld  
By J. J. SAVAGE TO DATE.
- 3.) THE COMPLAINT SHOULD NOT BE DEN  
DISMISSED WITHOUT AN EVIDENTIARY HEAR IN ORDER  
TO STOP THE ICE TEAM THE ABOVE DR. NO. 101

(over) ↘

2629.

4.) The Issues Contained in The Instant Complaint Present A Obvious Claim in - Which PETITIONER WAS SUBJECTED TO THREAT OF IMMINENT DANGER AND WOULD THEREFORE PRESENT A Valid Claim in Which Plaintiff Could Prevail ON A TRIAL.

WHEREFORE Plaintiff Would Move TO REINSTATE This Case. AND SET MATTER FOR AN EVIDENTIARY HEARING.

X 

Mr. Ronald E. Proctor ###163750 Jr.  
Delaware Correctional Center  
1181 Paddock Road  
Smyrna, DE 19977

+ Dated. 7-21-05 